

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a)	
Canadian corporation, and J-SQUARE)	
TECHNOLOGIES (OREGON) INC., an)	
Oregon corporation,)	
)	
Plaintiffs,)	
v.)	C.A. No. 04-CV-960-SLR
MOTOROLA, INC., a Delaware corporation.)	
Defendant.)	

**EXHIBIT T TO
MOTOROLA'S RESPONSE TO PLAINTIFFS'
MOTION FOR PROTECTIVE ORDER**

YOUNG CONAWAY STARGATT & TAYLOR, LLP
/s/ William W. Bowser

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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC.,
J-SQUARED TECHNOLOGIES (OREGON)
INC.,

Plaintiffs,

v.

MOTOROLA, INC.,

Defendant.

RECEIVED
4-10-06
By R. Papetti

C.A. No. 04-960-SLR

JURY TRIAL DEMANDED

**PLAINTIFF J-SQUARED TECHNOLOGIES, INC.'S
RESPONSES TO DEFENDANT'S SECOND SET OF INTERROGATORIES,
REQUESTS FOR ADMISSIONS AND REQUESTS FOR PRODUCTION**

Pursuant to Federal Civil Rules 26, 33 and 34, Plaintiff J-Squared Technologies, Inc. ("Plaintiff"), by its undersigned counsel, hereby responds to Defendant Motorola, Inc.'s ("Defendant") Second Set of Interrogatories, Requests for Admissions and Requests for Production as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to the overall number of interrogatories propounded, including subparts, as exceeding the 25 permitted under the Federal Rules and the Court's scheduling order. In the spirit of cooperation, Plaintiff will respond to all interrogatories set forth in this, Defendant's Second Set of Interrogatories. Plaintiff does not waive and expressly reserves its right to object to the total number of interrogatories served as exceeding the 25 interrogatories permitted under the Rules.

2. Plaintiff objects to Defendant's Second Set of Interrogatories, Requests for Admission and Requests for Production (collectively, the "Discovery Requests") to the extent that the interrogatories contained therein seek information or documents that are protected by any privilege, including but not limited to the attorney-client privilege. The inadvertent

acknowledgement by Plaintiff that it is aware of or is currently in possession, custody or control of information or documents responsive to the Discovery Requests.

9. The General Objections are incorporated in every individual response set forth below, whether referenced specifically or not.

Interrogatories

17. In paragraph eight of the Complaint, Plaintiffs alleged that JST “represents a number of manufacturers throughout Canada.” Identify with specificity the number of manufacturers that JST represented in Canada from January 2000 through December 2003 and that JST currently represents, including the name of the manufacturer, the effective date of the manufacturer representative contract, the termination and term/duration language in the manufacturer representative contract, and the types of products being sold. To the extent that JST provides copies of these contracts pursuant to Request for Production No. 17 *infra*, it does not need to respond to this Interrogatory.

RESPONSE:

Subject to its General Objections, Plaintiff further objects to this interrogatory as requesting information that it commercially sensitive and proprietary. Without waiver of its general and specific objections, Plaintiff references the deposition transcripts of its employees Claude Langlois, Steve Blomme, Jeffrey Gibson and Mike Nykoluk. Plaintiff will not further identify or produce contracts for its other clients as Motorola is a direct competitor to many of the manufacturers.

18. To the extent not covered by your response to Interrogatory No. 17, explain with specificity how JST became a manufacturer representative for Interphase, including how JST made contact with Interphase, when JST entered into its contract with Interphase, the termination and term/duration language in JST’s manufacturer representative contract with Interphase, and

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JURY TRIAL DEMANDED

NOTICE OF SERVICE

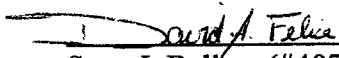
PLEASE TAKE NOTICE that on April 4, 2006 true and correct copies of *Plaintiff J-Squared Technologies, Inc.'s Responses Defendant Motorola, Inc.'s Second Set of Interrogatories, Requests for Admissions and Requests for Production* were served upon the following parties:

William W. Bowser
Young Conaway Stargatt & Taylor
The Brandywine Building
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Wilmington, DE 19801

Randy Papetti
Lewis and Roca LLP
40 N. Central Avenue
Phoenix, AZ 85004

Dated: April 4, 2006

Of counsel:
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, David A. Felice, do hereby certify that on April 4, 2006, I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing to the following counsel of record:

William W. Bowser
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**PLAINTIFF J-SQUARED TECHNOLOGIES (OREGON), INC.'S
RESPONSES TO DEFENDANT'S SECOND SET OF INTERROGATORIES,
REQUESTS FOR ADMISSIONS AND REQUESTS FOR PRODUCTION**

Pursuant to Federal Civil Rules 26, 33 and 34, Plaintiff J-Squared Technologies (Oregon), Inc. ("Plaintiff"), by its undersigned counsel, hereby responds to Defendant Motorola, Inc.'s ("Defendant") Second Set of Interrogatories, Requests for Admissions and Requests for Production as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to the overall number of interrogatories propounded, including subparts, as exceeding the 25 permitted under the Federal Rules and the Court's scheduling order. In the spirit of cooperation, Plaintiff will respond to all interrogatories set forth in this, Defendant's Second Set of Interrogatories. Plaintiff does not waive and expressly reserves its right to object to the total number of interrogatories served as exceeding the 25 interrogatories permitted under the Rules.

2. Plaintiff objects to Defendant's Second Set of Interrogatories, Requests for Admission and Requests for Production (collectively, the "Discovery Requests") to the extent that the interrogatories contained therein seek information or documents that are protected by any privilege, including but not limited to the attorney-client privilege. The inadvertent

acknowledgement by Plaintiff that it is aware of or is currently in possession, custody or control of information or documents responsive to the Discovery Requests.

9. The General Objections are incorporated in every individual response set forth below, whether referenced specifically or not.

Interrogatories

22. In paragraph nine of the Complaint, Plaintiffs alleged that JSO “represents a number of manufacturers throughout the United States.” Identify with specificity the number of manufacturers that JSO represented in the United States from January 2000 through February 2004 and that JSO currently represents, including the name of the manufacturer, the effective date of the manufacturer representative contract, the termination and term/duration language in the manufacturer representative contract, and the types of products being sold. To the extent that JSO provides copies of these contracts pursuant to Request for Production No. 18, it does not need to respond to this Interrogatory.

RESPONSE:

Subject to its General Objections, Plaintiff further objects to this interrogatory as requesting information that it commercially sensitive and proprietary. Without waiver of its general and specific objections, Plaintiff references the deposition transcripts of its employees Claude Langlois, Steve Blomme, Jeffrey Gibson and Mike Nykoluk. Plaintiff will not further identify or produce contracts for its other clients as Motorola is a direct competitor to many of the manufacturers.

23. Describe with specificity the total amount of commissions Motorola paid JSO from April 1, 2003 to the present and identify all facts and documents that support your answer.

RESPONSE:

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J-SQUARED TECHNOLOGIES, INC.,
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Defendant.

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JURY TRIAL DEMANDED

NOTICE OF SERVICE

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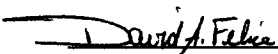
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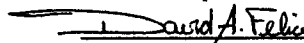

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